

PIERCE ATWOOD

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Admitted in: MA, ME, NH

VIA Email and First Class Mail

January 23, 2015

Susan Scott, Esq.
Senior Enforcement Counsel
U.S. Environmental Protection Agency
5 Post Office Square
Suite 100, Mail Code OES04-4
Boston, MA 02109-3912

Donna Murray, Enforcement Coordinator
U.S. Environmental Protection Agency
Office of Site Remediation & Restoration
5 Post Office Square, Suite 100 (OSRR07-2)
Boston, MA 02109-3912

RE: Little Falls Property of S.D. Warren Company in Windham and Gorham, Maine -
Response to CERCLA Information Request - Newly Discovered Document

Dear Susan and Ms. Murray:

I am writing on behalf of client S.D. Warren Company (d/b/a Sappi Fine Paper North America) ("Sappi"), in additional response to the letter from Anni Loughlin, U.S. Environmental Protection Agency ("EPA") dated October 9, 2014, which included EPA's Request for Information Pursuant to Section 104 of CERCLA for the Keddy Mill Superfund Site ("Information Request" for the "Site"). The executed response of Sappi ("Response") was provided to you by my transmittal letter of November 24, 2014.

In reviewing old files for possible destruction in accord with document retention practices, Sappi just identified the enclosed document that may be responsive to Information Request paragraph 4 relating to the efforts of contractors who performed work at the Sappi properties. The enclosed document is a letter report from Oak Engineers dated June 12, 2007. It was not prepared for Sappi or by its contractors; the work was done for the benefit of the prospective developers of the Keddy Mill, but a copy of the report was provided to Sappi. The letter report describes what steps might be taken if the Keddy Mill were developed.



SDMS DocID 568738

Susan Scott, Esq.
Donna Murray
January 23, 2015
Page 2

Please let me know if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Ken' followed by a stylized, elongated flourish that ends in a horizontal line.

Kenneth F. Gray

cc: without enclosure:
Anni Loughlin, ME/VT/CT Superfund Section, EPA
Leslie McVickar, Remedial Project Manager, EPA
Briana K. O'Regan, Assistant General Counsel, Sappi
Dana Beaulieu, EHS Manager, Sappi
Thomas Howard, Environmental Manager, Sappi



ENGINEERS

Civil Engineers & Land Surveyors

COPY

June 12, 2007

Project 064006-02

Lee D. Allen, P.E.
Northeast Civil Solutions
153 U.S. Route 1
Scarborough, Maine 04074

RE: Structural Condition Investigation
HRC Village at Little Falls, LLC
South Windham, Maine

Dear Lee:

Oak Engineers, LLC. (Oak) has completed structural condition investigation of the existing power plant and abandoned mill building foundations at the above site in accordance with our agreement dated March 12, 2007. The purpose of this investigation is to assess existing conditions and determine viable options for installing a retaining wall adjacent to the power plant property, which is currently owned and operated by Sappi. We understand that the proposed retaining wall must support the adjacent property without removing any of the existing back fill materials or disturbing the structure.

SCOPE OF INVESTIGATION

The investigation included the following tasks:

1. A site visit was conducted on February 8, 2006, and on March 29, 2007, by engineers from Oak to visually observe structural conditions of the mill building foundations and adjacent Sappi power plant. Mr. Tom Howard of Sappi provided access to the existing power plant during the March 2007 visit and provided general information regarding the power plant building's construction.
2. During the March visit, a dimensional survey of important building components and surrounding grades was conducted by Oak.
3. Existing conditions plan and section of the mill building and adjacent property was developed based on the field survey and information provided by Sappi (see Attachment)
4. An engineer evaluated existing structural conditions as well as subsurface information provided in a geotechnical report previously provided by Oak (report dated February 27, 2007) with respect to the proposed construction plans by Northeast Civil Solutions, Inc. (NCS).

5. Recommendations for design and construction of a retaining wall adjacent to the Sappi property and along the river were developed.

EXISTING CONDITIONS

Mill Building

The abandoned mill building is generally constructed of reinforced concrete columns, beams, and exterior walls, with either flat slab or ribbed floor construction. The south basement wall that is parallel to the river consists of 12-inch-thick concrete wall approximately 8 feet in height above the basement level floor slab and supports the exterior brick masonry walls extending three levels above the basement floor. It appears that the basement wall adjacent to the river is supported on concrete piers spaced approximately 25 feet apart.

The basement wall located at the west end of the building consists of approximately 48-inch-thick stone masonry wall extending approximately 8 feet above the elevated basement floor. Above the stone masonry, the wall is constructed of approximately 40-inch-thick brick masonry to the first-floor level. It appears that the upper brick masonry wall was originally above grade since large areas were blocked with concrete masonry units where windows once existed.

Water flows through open brick culverts (possibly penstocks) from the power plant property on the west side of the mill building and beneath the elevated structural floor slab in the basement. The water is directed and channeled through a system of concrete holding tanks and conduits beneath the slab and returns to the river beneath the building foundations on the south wall adjacent to the river.

Minor cracking or deterioration was observed in the south basement wall. The west basement wall appears to be stable at the stone masonry base. However, some buckling, patching, and localized structural failure was noted in the upper brick masonry wall.

The concrete walls, columns, and floors were sounded with sledge hammer in several locations and appeared to be sound.

Power Plant

The adjacent power plant building is constructed of cast-in-place concrete foundations and floor slabs with steel-framed and masonry superstructure. The powerhouse has three separate floor levels with elevations noted in the attached sketch provided by Sappi. The power house is connected to the existing mill building with a stone masonry foundation wall and upper concrete wall. There is a large opening in the stone masonry foundation wall approximately 4 feet wide by 8 feet high which provides access from the mill building to the tailrace area of the power plant.

The building appears to be in good condition and no significant damage was noted during our brief visit.

Lee D. Allen, P.E.
Northeast Civil Solutions

CONCLUSIONS

Based on the information obtained from this investigation, the following opinions regarding structural condition and the proposed construction are rendered:

- The existing power plant structure is not rigidly connected or attached to the mill building. Therefore, the proposed construction of a retaining wall should not disturb the existing structures.
- The mill building's basement wall adjoining the two properties is in poor condition.
- The existing open culverts beneath the mill building foundation wall are hydraulically connected to river flow.

RECOMMENDATIONS

Constructing the proposed retaining wall adjacent to the power plant is considered feasible; however, we recommend the following precautionary measures:

- Due to the poor condition of the existing basement wall adjoining the two properties, the existing wall should remain in place and be properly braced throughout construction of the proposed wall.
- The existing underground brick conduits must be either blocked in place or otherwise re-routed through the proposed wall. Further investigation of the implications of blocking these hydraulic structures is recommended, if blocking is the preferred alternative.

The following options were considered viable approaches for constructing the proposed retaining structure:

1. Soldier pile wall with lagging.
2. Rigid concrete retaining wall.

The first option would require steel H-piles spaced approximately 6 feet on center and socketed into sound bedrock. Additionally, the finished wall would most likely require either tie-backs or struts due to the proposed retained height and apparent depth to bedrock. Tie-backs would extend into the adjacent property and require anchorage into the bedrock, and therefore are not feasible for this project. Struts would require steel supports extending into the river bank and were considered to be costly and unsightly. Therefore, due to costs and aesthetics, we considered this option to be no longer feasible.

We recommend that the proposed retaining wall consist of reinforced concrete stem and foundation supported on micro-piles socketed into the bedrock. We believe micro-piles will provide adequate tensile

Lee D. Allen, P.E.
Northeast Civil Solutions

and compressive strength for the proposed wall foundations and, due to the wall's rigidity, tie-backs or struts will not be required.

CLOSURE

This report has been prepared to assist in the design and construction of an earth retaining wall structure as part of the Village at Little Falls development in, South Windham, Maine. The recommendations have been presented on the basis of an understanding of the project as described herein, and through the application of generally accepted foundation engineering practices. No other warranties, expressed or implied, are made.

We thank you for the opportunity to provide structural engineering services to assist in developing plans for this project. Please call me if you have any questions regarding this report or need any further assistance. We will proceed with developing design plans and details for Option 2 above and according to our agreement unless you provide direction otherwise.

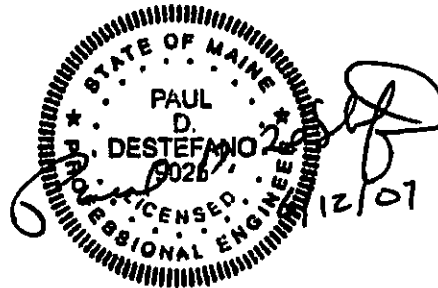
Sincerely,

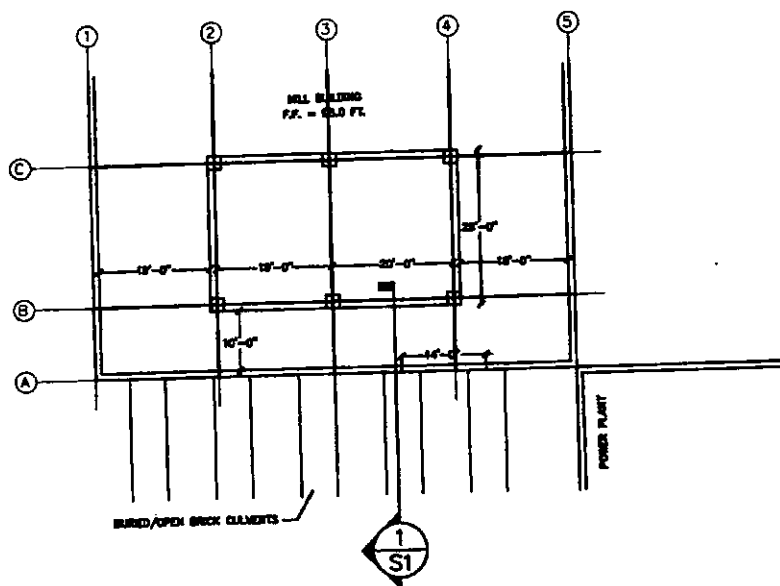
OAK ENGINEERS, LLC.

Paul D. DeStefano, Ph.D., P.E.
Director, Geotechnical and Structural Services

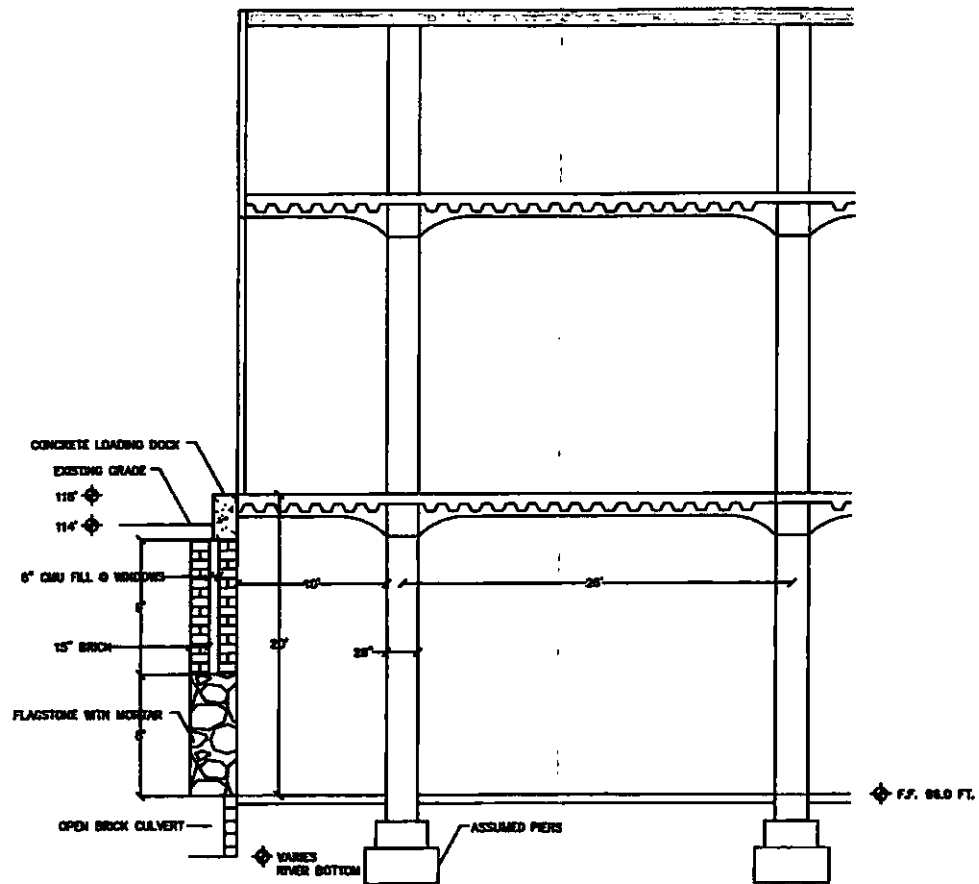
PDD:sh
Attachments

cc: Steve Etzel, Questor, Inc.
✓ S.D. Warren Company





PARTIAL SITE PLAN
SCALE: 1" = 40'



TYPICAL SECTION
SCALE: 1/2" = 1'-0"

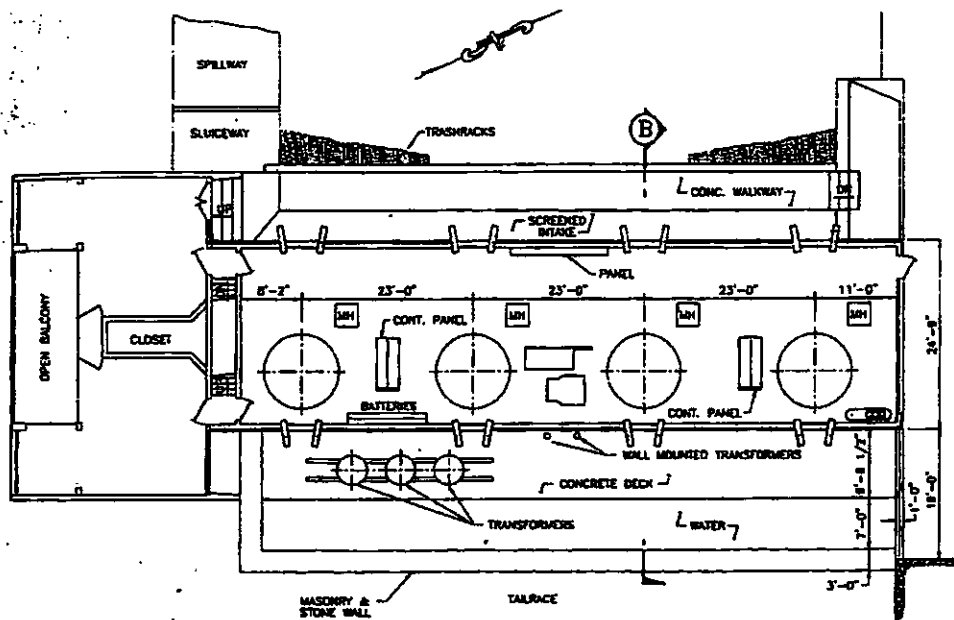
OAK
ENGINEERS

Brown's Wharf
Newburyport, MA 01950
(978) 465-8877

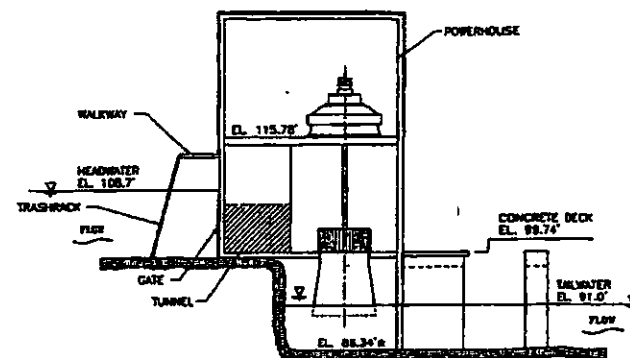
PREPARED FOR: NORTHEAST CIVIL SOLUTIONS
153 US ROUTE 1
SCARBOROUGH, ME 04074

SITE: VILLAGE AT LITTLE FALLS
13 DEPOT STREET
SOUTH WINDHAM, MAINE

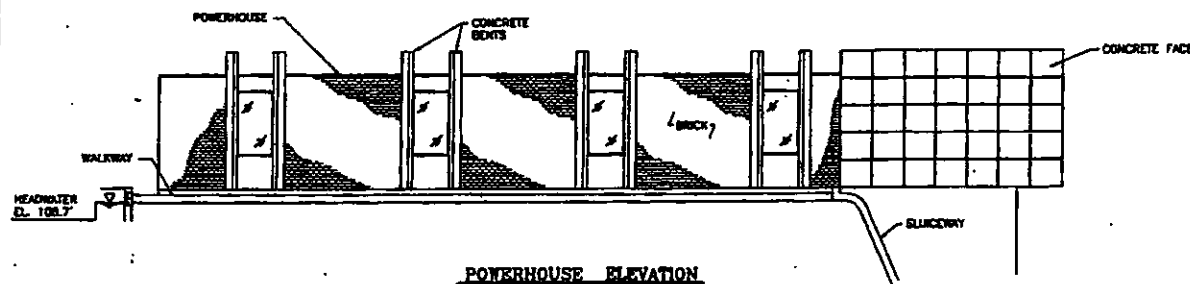
DATE: JUNE 2007
PROJECT: 084006
FIGURE: 1



POWERHOUSE PLAN



SECTION B



POWERHOUSE ELEVATION

SCALE IN FEET
0 5 10

THIS DRAWING IS A PART OF THE APPLICATION
FOR A LICENSE BY THE UNDERSIGNED ON
THIS 20th DAY OF Jan. 19 99
BY Thomas J. Warren S.D. WARREN.

NO.	REVISIONS	DATE

KA Kleinschmidt Associates
Consulting Engineers
Pittsfield, Maine

THIS DRAWING IS THE PROPERTY OF
S. D. WARREN CO., AND IS TO BE
RETURNED AFTER ITS USE. IT IS TO BE
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S. D. W. EQUIPMENT SIZES NUMBERS

814-01.80-013	
878-000.80-004	
878-118.80-000	
814-01.80-000	

HYDRO ELECTRIC
LITTLE FALLS
POWERHOUSE PLAN AND SECTION

J. D. WARREN CO.
WESTBROOK, MAINE

DESIGN	SCALE AS SHOWN
DRAWN HMF	JOB ORDER
APPROVED	DATE 814-01
CHECKED MCS	DATE 12-8-97
DWG NO. CB-63341	SHEET 2 OF 2

EXHIBIT F
LITTLE FALLS PROJECT
FERC NO. 2941
POWERHOUSE PLAN
AND SECTION
S.D. WARREN COMPANY
WESTBROOK, MAINE

KA 023-057 12/88

KA	Kleinschmidt Associates Consulting Engineers Pittsfield, Maine

NOTE: ALL ELEVATIONS ARE U.S.G.S. DATUM

EXHIBIT F SHEET 2 OF 2 FERC NO. 2941

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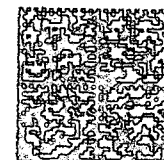
First Class Mail

7-2

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UNITED STATES
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